

**UNITED STATES DISTRICT COURT  
FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

STACI WATKINS,	)	
	)	
Plaintiff	)	
	)	
v.	)	<b>Case No.: 4:15-cv-00842-MWB</b>
	)	
SYNCHRONY BANK F/K/A GE	)	
CAPITAL RETAIL BANK,	)	
	)	
Defendant	)	

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**PLAINTIFF'S MOTION TO DISMISS DEFENDANT'S COUNTERCLAIM  
PURSUANT TO FED.R.CIV.P 12(b)(1)**

NOW COMES, Plaintiff, Staci Watkins, by and through her attorneys Kimmel & Silverman, P.C., who files this Motion to Dismiss Defendant's Counterclaim for lack of subject-matter jurisdiction pursuant to Fed.R.Civ.P. 12(b)(1). For the reasons set forth in the accompanying Memorandum of Law, Plaintiff respectfully requests that this Honorable Court dismiss Defendant's counterclaim.

DATED: July 7, 2015

/s/ Craig Thor Kimmel  
CRAIG THOR KIMMEL  
Kimmel & Silverman, P.C.  
30 East Butler Pike  
Ambler, PA 19002  
Telephone: (215) 540-8888 ext. 116  
Facsimile: (877) 788-2864  
Email: kimmel@creditlaw.com